

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MERVAT MIKHAEIL,

U.S. District Case No.
2:13-CV-14107

Plaintiff,

Honorable Nancy G. Edmunds
Magistrate Judge David R. Grand

v

WALGREEN'S INC.,

Defendant.

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**DEFENDANT'S CORRECTION TO MOTION FOR PROTECTIVE
ORDER, DOCKET NO. 19**

Defendant Walgreen Company¹ (“Walgreen”), through its attorneys, provides the following correction to its motion for a protective order filed on Wednesday, September 24, 2014:

1. In its September 24, 2014 motion for a protective order, Walgreen stated that its Corporate Manager Susan Dobrowolski was resident in Illinois. (Dkt. 19 at 1, 4-5.) This representation was based on Walgreen’s initial disclosures, which provided that Ms. Dobrowolski’s business address is in Deerfield, Illinois.

2. Today, September 29, 2014, counsel was made aware that while the representation is accurate insofar as Ms. Dobrowolski’s primary work location is in Deerfield, Illinois it requires supplementation as she has a secondary business office in Southfield, Michigan, and a personal residence in Michigan. While the location of Ms. Dobrowolski’s secondary office and personal residence should have no effect on the Court’s order—that three business days’ notice for five depositions is unreasonable (Dkt. No. 21 at 3)—Walgreen supplements its motion out of an abundance of caution, and in the interests of complete disclosure.

¹ Incorrectly identified in Plaintiff’s Complaint as “Walgreen’s Inc.”

KIENBAUM OPPERWALL HARDY
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By: /s/Thomas J. Davis

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Dated: September 29, 2014

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2014, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following: marla@atniplawyers.com. I hereby certify that I have caused to be served via U.S. mail the foregoing document to the following non-ECF participants:

(no manual recipients)

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